

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**SCOTT TURNAGE, CORTEZ D.
BROWN, DEONATAE TATE, JEREMY
S. MELTON, ISSACCA POWELL,
KEITH BURGESS, TRAVIS BOYD,
TERRENCE DRAIN and KIMBERLY
ALLEN on behalf of themselves and all
similarly situated persons,**

Plaintiffs,

vs.

**BILL OLDHAM, in his individual capacity
as former Sheriff of Shelby County,
Tennessee; et al.**

Defendants.

Case No. 2:16-cv-2907-SHM/tmp

**CLASS ACTION COMPLAINT FOR
VIOLATIONS OF THE CIVIL
RIGHTS ACT OF 1871, 42 U.S.C. §
1983, TENNESSEE COMMON LAW,
DECLARATORY, AND
INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED
PURSUANT TO FED. R. CIV.
PRO. 38(a) & (b)**

**MOTION FOR SUBSTITUTION OF COUNSEL OF RECORD
FOR DEFENDANT TETRUS CORP.**

Defendant Tetrus Corp. (“Tetrus”), by and through its attorneys, requests this Court to allow the substitution of its counsel of record in this case. In support of its Motion, Tetrus states:

Attorneys Thomas Anthony Swafford and J. Bennett Fox, Jr., along with their law firm, Adams and Reese LLP, should be allowed to withdraw as counsel of record for Tetrus, and be relieved of all further obligations as counsel for Tetrus.

Tetrus has identified substitute counsel who has filed a Notice of Appearance on behalf of Tetrus: Robert A. McLean and Garrett M. Estep of the law firm Farris Bobango Branan PLC.

This substitution of counsel will not delay trial in this action given that discovery is in its early stages.

Pursuant to Local Rule 7.2(a)(1)(B), Tetrus has consulted with counsel for the other parties who all consent to the relief sought in this Motion.

For these reasons, Tetrus requests this Court enter an Order relieving Thomas Anthony Swafford and J. Bennett Fox, Jr., along with their law firm, Adams and Reese LLP, as counsel for Tetrus, and substituting Robert A. McLean and Garrett M. Estep of the law firm Farris Bobango Branan PLC, as counsel for Tetrus.

Respectfully submitted,

ADAMS AND REESE LLP

/s/ Thomas Anthony Swafford

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 12th day of December 2019, the foregoing was served via ECF to below-referenced counsel:

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/s/ Thomas Anthony Swafford